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Attorneys for Defendant WEILI DAI

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE MARVELL TECHNOLOGY
GROUP, LTD. SECURITIES LITIGATION

Case No. C-06-06286 (RMW)

CLASS ACTION

**DEFENDANT WEILI DAI'S ANSWER
TO CONSOLIDATED CLASS ACTION
COMPLAINT**

This Document Relates To:

ALL ACTIONS.

1 Defendant Weili Dai, by her attorneys, responds to the Consolidated Class Action
2 Complaint (“Complaint”) in the above-captioned action as follows:

3 1. Ms. Dai asserts her rights under the Fifth Amendment to the United States
4 Constitution and declines to answer each and every allegation contained in paragraph 1 of the
5 Complaint on the grounds that any such answers might tend to incriminate her.

6 2. Ms. Dai asserts her rights under the Fifth Amendment to the United States
7 Constitution and declines to answer each and every allegation contained in paragraph 2 of the
8 Complaint on the grounds that any such answers might tend to incriminate her.

9 3. Ms. Dai asserts her rights under the Fifth Amendment to the United States
10 Constitution and declines to answer each and every allegation contained in paragraph 3 of the
11 Complaint on the grounds that any such answers might tend to incriminate her.

12 4. Ms. Dai asserts her rights under the Fifth Amendment to the United States
13 Constitution and declines to answer each and every allegation contained in paragraph 4 of the
14 Complaint on the grounds that any such answers might tend to incriminate her.

15 5. Ms. Dai asserts her rights under the Fifth Amendment to the United States
16 Constitution and declines to answer each and every allegation contained in paragraph 5 of the
17 Complaint on the grounds that any such answers might tend to incriminate her.

18 6. Ms. Dai asserts her rights under the Fifth Amendment to the United States
19 Constitution and declines to answer each and every allegation contained in paragraph 6 of the
20 Complaint on the grounds that any such answers might tend to incriminate her.

21 7. Ms. Dai asserts her rights under the Fifth Amendment to the United States
22 Constitution and declines to answer each and every allegation contained in paragraph 7 of the
23 Complaint on the grounds that any such answers might tend to incriminate her.

24 8. Ms. Dai asserts her rights under the Fifth Amendment to the United States
25 Constitution and declines to answer each and every allegation contained in paragraph 8 of the
26 Complaint on the grounds that any such answers might tend to incriminate her.

1 9. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 9 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 10. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 10 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 11. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 11 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 12. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 12 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 13. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 13 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 14. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 14 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 15. Ms. Dai denies knowledge or information sufficient to form a belief as to
20 the truth of any of the allegations of paragraph 15 of the Complaint, and on that basis denies each
21 and every such allegation, except Dai admits that Lead Plaintiffs purport to assert claims arising
22 under the statutes cited and purport to establish jurisdiction under the statutes cited.

23 16. Ms. Dai denies knowledge or information sufficient to form a belief as to
24 the truth of any of the allegations of paragraph 16 of the Complaint, and on that basis denies each
25 and every such allegation, except Dai admits that Marvell Semiconductor, Inc. is a wholly owned
26 operating subsidiary of Marvell, admits that Marvell's U.S. headquarters were located within this
27 District at all times relevant to the Complaint, and admits that Marvell Semiconductor, Inc. was
28 located within this District at all times during the Class Period.

1 17. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 17 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 18. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 18 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 19. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 19 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 20. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 20 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 21. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 21 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 22. Ms. Dai denies knowledge or information sufficient to form a belief as to
17 the truth of any of the allegations of paragraph 22 of the Complaint, and on that basis denies each
18 and every allegation of paragraph 22 of the Complaint, except she admits that, by Order of the
19 Court issued on February 2, 2007 and amended on February 7, 2007, PFRS, PRGERS and Monte
20 Paschi were appointed Lead Plaintiffs in this action, purportedly on behalf of a class of
21 purchasers of Marvell common stock.

22 23. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 23 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 24. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 24 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28 25. Ms. Dai admits the allegations in paragraph 25 of the Complaint.

1 26. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 26 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 27. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 27 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 28. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 28 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 29. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 29 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 30. Ms. Dai admits the allegations in paragraph 30 of the Complaint.

14 31. Ms. Dai asserts her rights under the Fifth Amendment to the United States
15 Constitution and declines to answer each and every allegation contained in paragraph 31 of the
16 Complaint on the grounds that any such answers might tend to incriminate her.

17 32. Ms. Dai asserts her rights under the Fifth Amendment to the United States
18 Constitution and declines to answer each and every allegation contained in paragraph 32 of the
19 Complaint on the grounds that any such answers might tend to incriminate her.

20 33. Ms. Dai asserts her rights under the Fifth Amendment to the United States
21 Constitution and declines to answer each and every allegation contained in paragraph 33 of the
22 Complaint on the grounds that any such answers might tend to incriminate her.

23 34. Ms. Dai asserts her rights under the Fifth Amendment to the United States
24 Constitution and declines to answer each and every allegation contained in paragraph 34 of the
25 Complaint on the grounds that any such answers might tend to incriminate her.

26 35. Ms. Dai asserts her rights under the Fifth Amendment to the United States
27 Constitution and declines to answer each and every allegation contained in paragraph 35 of the
28 Complaint on the grounds that any such answers might tend to incriminate her.

1 36. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 36 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 37. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 37 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 38. Ms. Dai admits that at times the Complaint collectively refers to Dr.
8 Sutardja, Ms. Dai and Mr. Hervey as the "Individual Defendants."

9 39. Ms. Dai asserts her rights under the Fifth Amendment to the United States
10 Constitution and declines to answer each and every allegation contained in paragraph 39 of the
11 Complaint on the grounds that any such answers might tend to incriminate her.

12 40. Ms. Dai asserts her rights under the Fifth Amendment to the United States
13 Constitution and declines to answer each and every allegation contained in paragraph 40 of the
14 Complaint on the grounds that any such answers might tend to incriminate her.

15 41. Ms. Dai asserts her rights under the Fifth Amendment to the United States
16 Constitution and declines to answer each and every allegation contained in paragraph 41 of the
17 Complaint on the grounds that any such answers might tend to incriminate her.

18 42. Ms. Dai denies knowledge or information sufficient to form a belief as to
19 the truth of any of the allegations of paragraph 42 of the Complaint, and on that basis denies each
20 and every such allegation, except Dai admits that Lead Plaintiffs purport to bring their claim
21 under the rules cited and on behalf of the individuals cited.

22 43. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 43 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 44. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 44 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28

1 45. Ms. Dai denies knowledge or information sufficient to form a belief as to
2 the truth of any of the allegations of paragraph 45 of the Complaint, and on that basis denies each
3 and every allegation of paragraph 45 of the Complaint.

4 46. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 46 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 47. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 47 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 48. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 48 of the
12 Complaint, including subparts (a) through (e), on the grounds that any such answers might tend
13 to incriminate her.

14 49. Ms. Dai denies knowledge or information sufficient to form a belief as to
15 the truth of any of the allegations of paragraph 49 of the Complaint, and on that basis denies each
16 and every allegation of paragraph 49 of the Complaint.

17 50. Ms. Dai asserts her rights under the Fifth Amendment to the United States
18 Constitution and declines to answer each and every allegation contained in paragraph 50 of the
19 Complaint on the grounds that any such answers might tend to incriminate her.

20 51. Ms. Dai asserts her rights under the Fifth Amendment to the United States
21 Constitution and declines to answer each and every allegation contained in paragraph 51 of the
22 Complaint on the grounds that any such answers might tend to incriminate her.

23 52. Ms. Dai asserts her rights under the Fifth Amendment to the United States
24 Constitution and declines to answer each and every allegation contained in paragraph 52 of the
25 Complaint on the grounds that any such answers might tend to incriminate her.

26 53. Ms. Dai asserts her rights under the Fifth Amendment to the United States
27 Constitution and declines to answer each and every allegation contained in paragraph 53 of the
28 Complaint on the grounds that any such answers might tend to incriminate her.

1 54. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 54 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 55. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 55 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 56. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 56 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 57. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 57 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 58. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 58 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 59. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 59 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 60. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 60 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 61. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 61 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 62. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 62 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28

1 63. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 63 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 64. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 64 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 65. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 65 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 66. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 66 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 67. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 67 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 68. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 68 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 69. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 69 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 70. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 70 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 71. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 71 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28

1 72. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 72 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 73. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 73 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 74. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 74 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 75. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 75 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 76. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 76 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 77. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 77 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 78. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 78 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 79. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 79 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 80. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 80 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
28

1 81. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 81 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 82. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 82 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 83. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 83 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 84. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 84 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 85. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 85 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 86. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 86 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 87. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 87 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 88. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 88 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 89. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 89 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 90. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 90 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 91. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 91 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 92. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 92 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 93. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 93 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 94. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 94 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 95. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 95 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 96. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 96 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 97. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 97 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 98. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 98 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28

1 99. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 99 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 100. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 100 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 101. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 101 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 102. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 102 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 103. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 103 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 104. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 104 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 105. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 105 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 106. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 106 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 107. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 107 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28

1 108. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 108 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 109. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 109 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 110. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 110 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 111. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 111 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 112. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 112 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 113. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 113 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 114. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 114 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 115. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 115 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 116. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 116 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
28

1 117. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 117 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 118. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 118 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 119. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 119 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 120. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 120 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 121. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 121 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 122. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 122 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 123. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 123 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 124. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 124 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 125. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 125 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

28

1 126. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 126 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 127. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 127 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 128. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 128 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 129. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 129 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 130. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 130 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 131. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 131 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 132. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 132 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 133. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 133 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 134. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 134 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
28

1 135. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 135 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 136. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 136 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 137. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 137 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 138. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 138 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 139. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 139 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 140. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 140 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 141. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 141 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 142. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 142 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 143. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 143 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 144. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 144 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 145. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 145 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 146. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 146 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 147. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 147 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 148. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 148 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 149. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 149 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 150. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 150 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 151. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 151 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 152. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 152 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 153. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 153 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 154. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 154 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 155. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 155 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 156. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 156 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 157. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 157 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 158. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 158 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 159. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 159 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 160. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 160 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 161. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 161 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
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1 162. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 162 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 163. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 163 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 164. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 164 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 165. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 165 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 166. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 166 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 167. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 167 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 168. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 168 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 169. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 169 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 170. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 170 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
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1 171. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 171 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 172. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 172 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 173. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 173 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 174. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 174 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 175. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 175 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 176. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 176 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 177. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 177 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 178. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 178 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 179. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 179 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
28

1 180. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 180 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 181. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 181 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 182. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 182 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 183. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 183 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 184. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 184 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 185. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 185 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 186. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 186 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 187. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 187 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 188. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 188 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 189. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 189 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 190. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 190 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 191. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 191 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 192. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 192 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 193. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 193 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 194. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 194 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 195. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 195 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 196. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 196 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 197. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 197 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 198. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 198 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 199. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 199 of the
6 Complaint on the grounds that any such answers might tend to incriminate her, other than
7 admitting that Lead Plaintiffs purport to assert claims arising under the statutes cited.

8 200. Ms. Dai asserts her rights under the Fifth Amendment to the United States
9 Constitution and declines to answer each and every allegation contained in paragraph 200 of the
10 Complaint on the grounds that any such answers might tend to incriminate her.

11 201. Ms. Dai asserts her rights under the Fifth Amendment to the United States
12 Constitution and declines to answer each and every allegation contained in paragraph 201 of the
13 Complaint on the grounds that any such answers might tend to incriminate her.

14 202. Ms. Dai asserts her rights under the Fifth Amendment to the United States
15 Constitution and declines to answer each and every allegation contained in paragraph 202 of the
16 Complaint on the grounds that any such answers might tend to incriminate her.

17 203. Ms. Dai asserts her rights under the Fifth Amendment to the United States
18 Constitution and declines to answer each and every allegation contained in paragraph 203 of the
19 Complaint, including subparts (a) through (f), on the grounds that any such answers might tend
20 to incriminate her.

21 204. Ms. Dai asserts her rights under the Fifth Amendment to the United States
22 Constitution and declines to answer each and every allegation contained in paragraph 204 of the
23 Complaint, including subparts (a) through (c), on the grounds that any such answers might tend
24 to incriminate her.

25 205. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 205 of the
27 Complaint, including subparts (a) through (c), on the grounds that any such answers might tend
28 to incriminate her.

1 206. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 206 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 207. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 207 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 208. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 208 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 209. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 209 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 210. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 210 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 211. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 211 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 212. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 212 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 213. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 213 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 214. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 214 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
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1 215. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 215 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 216. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 216 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 217. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 217 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 218. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 218 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 219. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 219 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 220. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 220 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 221. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 221 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 222. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 222 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 223. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 223 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.
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1 224. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 224 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 225. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 225 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 226. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 226 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 227. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 227 of the
12 Complaint, including subparts (a) through (d), on the grounds that any such answers might tend
13 to incriminate her.

14 228. Ms. Dai asserts her rights under the Fifth Amendment to the United States
15 Constitution and declines to answer each and every allegation contained in paragraph 228 of the
16 Complaint, including subparts (a) through (g), on the grounds that any such answers might tend
17 to incriminate her.

18 229. Ms. Dai asserts her rights under the Fifth Amendment to the United States
19 Constitution and declines to answer each and every allegation contained in paragraph 229 of the
20 Complaint on the grounds that any such answers might tend to incriminate her.

21 230. Ms. Dai asserts her rights under the Fifth Amendment to the United States
22 Constitution and declines to answer each and every allegation contained in paragraph 230 of the
23 Complaint on the grounds that any such answers might tend to incriminate her.

24 231. Ms. Dai asserts her rights under the Fifth Amendment to the United States
25 Constitution and declines to answer each and every allegation contained in paragraph 231 of the
26 Complaint on the grounds that any such answers might tend to incriminate her.

1 232. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 232 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 233. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 233 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 234. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 234 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 235. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 235 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 236. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 236 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 237. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 237 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 238. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 238 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 239. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 239 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 240. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 240 of the
27 Complaint on the grounds that any such answers might tend to incriminate her, other than
28 admitting that Lead Plaintiffs purport to assert claims arising under the statutes cited.

1 241. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 241 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 242. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 242 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 243. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 243 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 244. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 244 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 245. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 245 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 246. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 246 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 247. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 247 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 248. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 248 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 249. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 249 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 250. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 250 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 251. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 251 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 252. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 252 of the
9 Complaint on the grounds that any such answers might tend to incriminate her.

10 253. Ms. Dai asserts her rights under the Fifth Amendment to the United States
11 Constitution and declines to answer each and every allegation contained in paragraph 253 of the
12 Complaint on the grounds that any such answers might tend to incriminate her.

13 254. Ms. Dai asserts her rights under the Fifth Amendment to the United States
14 Constitution and declines to answer each and every allegation contained in paragraph 254 of the
15 Complaint on the grounds that any such answers might tend to incriminate her.

16 255. Ms. Dai asserts her rights under the Fifth Amendment to the United States
17 Constitution and declines to answer each and every allegation contained in paragraph 255 of the
18 Complaint on the grounds that any such answers might tend to incriminate her.

19 256. Ms. Dai asserts her rights under the Fifth Amendment to the United States
20 Constitution and declines to answer each and every allegation contained in paragraph 256 of the
21 Complaint on the grounds that any such answers might tend to incriminate her.

22 257. Ms. Dai asserts her rights under the Fifth Amendment to the United States
23 Constitution and declines to answer each and every allegation contained in paragraph 257 of the
24 Complaint on the grounds that any such answers might tend to incriminate her.

25 258. Ms. Dai asserts her rights under the Fifth Amendment to the United States
26 Constitution and declines to answer each and every allegation contained in paragraph 258 of the
27 Complaint on the grounds that any such answers might tend to incriminate her.

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1 259. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 259 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 260. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 260 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 261. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 261 of the
9 Complaint, including subparts (a) through (f), on the grounds that any such answers might tend
10 to incriminate her.

11 262. Ms. Dai asserts her rights under the Fifth Amendment to the United States
12 Constitution and declines to answer each and every allegation contained in paragraph 262 of the
13 Complaint on the grounds that any such answers might tend to incriminate her.

14 263. Ms. Dai asserts her rights under the Fifth Amendment to the United States
15 Constitution and declines to answer each and every allegation contained in paragraph 263 of the
16 Complaint, including subparts (a) through (c), on the grounds that any such answers might tend
17 to incriminate her.

18 264. Ms. Dai asserts her rights under the Fifth Amendment to the United States
19 Constitution and declines to answer each and every allegation contained in paragraph 264 of the
20 Complaint on the grounds that any such answers might tend to incriminate her.

21 265. Ms. Dai asserts her rights under the Fifth Amendment to the United States
22 Constitution and declines to answer each and every allegation contained in paragraph 265 of the
23 Complaint on the grounds that any such answers might tend to incriminate her.

24 266. Ms. Dai asserts her rights under the Fifth Amendment to the United States
25 Constitution and declines to answer each and every allegation contained in paragraph 266 of the
26 Complaint on the grounds that any such answers might tend to incriminate her.

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1 267. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 267 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 268. Ms. Dai asserts her rights under the Fifth Amendment to the United States
5 Constitution and declines to answer each and every allegation contained in paragraph 268 of the
6 Complaint on the grounds that any such answers might tend to incriminate her.

7 269. Ms. Dai asserts her rights under the Fifth Amendment to the United States
8 Constitution and declines to answer each and every allegation contained in paragraph 269 of the
9 Complaint, including subparts (a) through (f), on the grounds that any such answers might tend
10 to incriminate her.

11 270. Ms. Dai asserts her rights under the Fifth Amendment to the United States
12 Constitution and declines to answer each and every allegation contained in paragraph 270 of the
13 Complaint on the grounds that any such answers might tend to incriminate her.

14 271. Ms. Dai asserts her rights under the Fifth Amendment to the United States
15 Constitution and declines to answer each and every allegation contained in paragraph 271 of the
16 Complaint on the grounds that any such answers might tend to incriminate her.

17 272. Ms. Dai asserts her rights under the Fifth Amendment to the United States
18 Constitution and declines to answer each and every allegation contained in paragraph 272 of the
19 Complaint on the grounds that any such answers might tend to incriminate her.

20 273. Ms. Dai asserts her rights under the Fifth Amendment to the United States
21 Constitution and declines to answer each and every allegation contained in paragraph 273 of the
22 Complaint on the grounds that any such answers might tend to incriminate her.

23 274. Ms. Dai asserts her rights under the Fifth Amendment to the United States
24 Constitution and declines to answer each and every allegation contained in paragraph 274 of the
25 Complaint, including subparts (a) through (f), on the grounds that any such answers might tend
26 to incriminate her.

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1 275. Ms. Dai asserts her rights under the Fifth Amendment to the United States
2 Constitution and declines to answer each and every allegation contained in paragraph 275 of the
3 Complaint on the grounds that any such answers might tend to incriminate her.

4 AFFIRMATIVE DEFENSES

5 Ms. Dai pleads the following affirmative defenses without waiving her
6 constitutional rights, including those rights secured by the Fifth Amendment to the Constitution
7 of the United States.

8 First Affirmative Defense

9 The Complaint, and each cause of action therein, fails to state a claim upon which
10 relief can be granted.

11 Second Affirmative Defense

12 Lead Plaintiffs' claims are barred in whole or in part by the doctrines of waiver,
13 ratification, laches, unclean hands, and/or estoppel.

14 Third Affirmative Defense

15 Lead Plaintiffs and other members of the putative plaintiff class are barred from
16 recovering for their injury or damage, if any, because they failed to make reasonable efforts to
17 mitigate such injury or damage, which would have prevented their injury or damage, if any.

18 Fourth Affirmative Defense

19 The claims alleged in the Complaint are barred, in whole or in part, by the
20 applicable statute of limitations.

21 Fifth Affirmative Defense

22 Lead Plaintiffs and members of the purported plaintiff class were negligent and
23 did not exercise due care to discover the existence of some or all of the facts alleged in the
24 Complaint upon which they assert liability against Defendants. Thus, the actual and proximate
25 cause of damage to plaintiffs, if any, in whole or in part, is plaintiffs' negligence and their
26 failure to exercise reasonable care.

Sixth Affirmative Defense

Ms. Dai is entitled to receive contribution and/or indemnity from others for any liability she incurs.

Seventh Affirmative Defense

Ms. Dai joins in and incorporates by reference each affirmative defense alleged by co-defendants to the extent that such affirmative defenses apply to her.

Additional Affirmative Defenses

Ms. Dai reserves the right to assert additional affirmative defenses once the precise nature of the relevant circumstances or events is determined through discovery.

PRAYER FOR RELIEF

WHEREFORE, defendant Weili Dai prays for relief as follows:

1. That judgment be entered in favor of Ms. Dai and against Lead Plaintiffs and other alleged members of the alleged class on all alleged claims for relief;

2. That Ms. Dai be awarded attorney's fees and costs of suit incurred in defending this action; and

3. For such other and further relief as the Court determines is just and appropriate.

1 DATED: January 12, 2009

2 Respectfully submitted,

3 TAYLOR & COMPANY LAW OFFICES, LLP

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9 — and —

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